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FEB 28 1994

Docket No. 50-412

Mr. J. D. Sieber
Senior Vice President
Nuclear Power Division
Duquesne Light Company
Post Office Box 4
Shippingport, Pennsylvania 15077

Dear Mr. Sieber:

SUBJECT: INSPECTION REPORT NO. 50-412/93-10 (OL)

This refers to your October 5, 1993, correspondence, in response to our July 7, 1993, letter.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

We appreciated your cooperation.

Sincerely,

Original Signed By:
Glenn W. Meyer

Glenn W. Meyer, Chief
PWR Section
Operations Branch
Division of Reactor Safety

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Mr. J. D. Sieber

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cc:

G. S. Thomas, Vice President, Nuclear Services
D. E. Spoerry, Vice President, Nuclear Operations
L. R. Freeland, General Manager, Nuclear Operations Unit
K. D. Grada, Manager, Quality Services Unit
N. R. Tonet, Manager, Nuclear Safety Department
H. R. Caldwell, General Superintendent, Nuclear Operations
K. Abraham, PAO (2) (w/copy of letter dtd October 5, 1993)
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector (w/copy of letter dtd October 5, 1993)
Commonwealth of Pennsylvania (w/copy of letter dtd October 5, 1993)
State of Ohio

bcc:

Region I Docket Room (with concurrences)
W. Lazarus, DRP
D. Lew, DRP
M. Shannon, ILPB
M. Oprendeck, DRP

bcc (VIA E-MAIL):

W. Butler, NRR
G. Edison, NRR
V. McCree, OEDO

RI:DRS
Stewart

02/18/94

RI:DRS
Meyer

02/18/94

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G:9310RL

Duquesne Light Company

Beaver Valley Power Station
P.O. Box 4
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JOHN D. SIEBER
Senior Vice President and
Chief Nuclear Officer
Nuclear Power Division

(412) 393-5255
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October 5, 1993

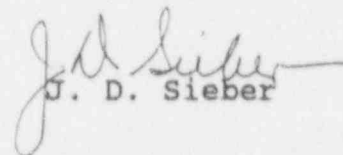
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

**Subject: Beaver Valley Power Station, Unit No. 2
Docket No. 50-412, License No. NPF-73
Initial Examination Report No. 50-412/93-10**

In response to NRC correspondence dated July 7, 1993, the attached reply addresses the four unresolved items identified in the subject examination report.

If there are any questions concerning this response, please contact Mr. L. R. Freeland at (412) 393-5101.

Sincerely,


J. D. Sieber

Attachment

cc: Mr. L. W. Rossbach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. L. H. Bettenhausen, Chief, Operations Branch
Division of Reactor Safety, Region I
Mr. G. E. Edison, Project Manager

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DUQUESNE LIGHT COMPANY
Nuclear Power Division
Beaver Valley Power Station

Reply to the Four Unresolved Items
Identified in Initial Examination Report No. 50-412/93-10

The subject NRC examination report identified four unresolved issues associated with guidance provided in plant procedures, and requested a written response describing our resolution of the issues. The following is our response:

Unresolved Item 50-412/93-10-01 identified the lack of specific procedural guidance to respond to the situation of the Reactor Protection System (RPS) being inoperable while the reactor is at power.

Response:

To resolve this item, the written policy provided to operators will be updated to address situations occurring with the reactor at power, where the RPS is determined to be incapable of automatically tripping the reactor. Existing guidance requires that the reactor be manually tripped whenever actual plant parameters indicate that either the reactor should have tripped or that an irreversible trend exists that will lead to a reactor trip. The policy will be revised by October 31, 1993, to add the requirement to perform an immediate plant shutdown if the RPS is determined to be incapable of automatically tripping the reactor and plant parameters are verified to be in their normal range. Applicable first out alarm response procedures will implement the policy statement as part of the revisions discussed below in Unresolved Item 93-10-04.

Unresolved Item 50-412/93-10-02 identified the inadequacy of procedure O.M. 2.13.4.AAI in that the procedure did not specifically direct the operator to secure a charging pump prior to securing the recirculation spray pump that was supplying suction to it.

Response:

The procedure O.M. 2.13.4.AAI has since been corrected to ensure suction supply is maintained to all operating charging pumps prior to shutting down a recirculation spray pump. Similar procedures were reviewed for both units and it was verified that this deficiency did not exist in the other procedures.

Unresolved Item 50-412/93-10-03 questioned the appropriateness of Abnormal Operating Procedures (AOPs) in dealing with events, and also questioned the adequacy of procedural guidance in assisting the operator in prioritizing off-normal events. The report also noted that the number of AOPs had previously been reduced by relocating some AOP guidance into Alarm Response Procedures (ARPs).

Response:

The shifting of some AOP information into ARPs was undertaken to simplify the location and use of procedural guidance that was previously difficult to find in a multi-section AOP, and required the operator to read through multiple pages of procedural steps in order to locate the situation-specific guidance needed. The separation of this AOP information into ARPs was validated by use at the simulator, and has contributed to improved operator performance in most situations. It is recognized that some situations require a more integrated approach to help operators rapidly organize and prioritize actions in response to events that generate multiple alarms. It is also recognized that it is unworkable to have AOPs or detailed alarm prioritization schemes for every multiple alarm scenario. With these considerations in mind, the existing set of AOPs will be reviewed to determine if additions or enhancements are required to address expected scenarios where integrated procedure response is needed. Operator and training instructor input will be solicited as part of this review, and procedure changes will be implemented as appropriate. The review will be completed by January 31, 1994, and a schedule will be established to develop or revise AOPs as appropriate to the priority of the event being covered.

To aid operators in prioritizing multiple alarms for unrelated situations for which an AOP does not exist, written guidance will be provided. The guidance will be based on technical grouping of types of alarms and judgment techniques used by skilled operators as standard industry practice. This guidance will be in effect by March 31, 1994.

Unresolved Item 50-412/93-10-04 identified inconsistencies and incompleteness of some Alarm Response Procedures associated with the A-5 (first out) alarm panel.

Response:

The first-out alarm response procedures will be reviewed and the stated deficiencies will be corrected, along with any other deficiencies identified during the review. The RPS failure guidance, discussed above in Unresolved Item 93-10-01, will be implemented as part of this first out ARP improvement task. This project will be completed by March 31, 1994.

Additional Comment: To preclude future occurrence of these types of problems, procedure preparers and reviewers will be briefed on the above issues, and instructed to include consideration of the appropriate policies and human performance considerations in future generation of procedures.